

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

2 LeMoyne Parkway Condominium Association)	
)	
)	
Plaintiff,)	Case No.1:23-cv-02130
)	Magistrate Judge Beth W. Jantz
v.)	
)	
Travelers Casualty Insurance Company of)	
America,)	
)	
Defendant.)	

JOINT STATUS REPORT

I. Discovery

- A. Briefly describe all fact and expert discovery that the parties have conducted, including any electronic discovery. Describe any discovery that the parties still need to complete and indicate whether the parties anticipate completing discovery by the current deadline.
- The Parties have completed written discovery.
 - On May 29, 2024, Plaintiff disclosed its expert witness's report.
 - If the matter does not proceed to a settlement conference, the parties will need to proceed with fact depositions and Defendant will need to make its expert disclosures.

II. Settlement

- A. Have any settlement discussions taken place? If so, what is the status?
- Plaintiff has invited settlement discussions.
 - Defendant would like the opportunity to review the report of Plaintiff's expert witness before deciding whether settlement discussions would be appropriate.
- B. Do the parties request a settlement conference at this time?
- Defendant believes that by the end of June 2024, after Defendant has had an opportunity to review the report of Plaintiff's expert witness, it will be in a position to decide whether a settlement conference would be appropriate.

Dated: May 29, 2024

Respectfully submitted,

**Travelers Casualty Insurance
Company of America**
Defendant

**2 LEMOYNE PARKWAY
CONDOMINIUM ASSOCIATION,**
Plaintiff

/s/ Thomas B. Orlando

/s/ Ross M. Good

Thomas B. Orlando
FORAN GLENNON PALANDECH PONZI &
RUDLOFF PC
222 N. LaSalle Street, Suite 1400
Chicago, IL 60601
312-863-5000
312-863-5099 (fax)
torlando@fgppr.com

David A. Eisenberg
Ross M. Good
LOFTUS & EISENBERG, LTD.
161 N. Clark, Suite 1600
Chicago, Illinois 60601
T: 312.899.6625
david@loftusandeisenberg.com
ross@loftusandeisenberg.com